

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	FCC 02-180
)	
Allocations and Service Rules for the 71-76 GHz, 81-86 GHz and 92-95 GHz Bands)	WT Docket No. 02-146
)	
Loca Communications Corporation Petition for Rulemaking)	RM-10288
)	

To: The Commission

COMMENTS of Howard Epstein
Consolidated Spectrum Services

The following are comments from Howard Epstein, President of Consolidated Spectrum Services. Consolidated Spectrum Services is a frequency coordination and engineering consulting company in the microwave services.

It is anticipated that the proposed rulemaking will foster the growth of equipment that will extend fiber links. This equipment will offer an alternative to lasers, which are currently on the market but are susceptible to fog. The cost of the equipment associated with this rulemaking will be beyond the personal user. As such this technology will be widely adapted by college campus, universities, hospitals and industry.

In paragraph 63 on page 25 the commission addresses unlicensed service in the 71-76 GHz and 81-86 GHz Bands. While this appears to be a good idea today, as the market develops it will not remain that way. We have already seen this in the 900 MHz, 2.4 GHz and other markets operating under part 15. I respectfully request that these bands be coordinated with each party stating a geographic area **only** as needed by each entity. They would be issued a license through the Universal Licensing System (ULS), which can already handle the input of a specific area.

The 92-95 GHz band I suggest, be divided up as follows: 92-93 GHz for unlicensed equipment under part 15. This is 1000 MHz for unlicensed spectrum that users could easily transmit 1 GB/S of information without much technology /cost. The 93-95 GHz Band I suggest be allocated as a dedicated point – point band for extension of networks.

The coordination standards of 47CFR101.803 should be enforced for geographic and dedicated point to point applications. Coordination and FCC license fees are a minor charge to those with major investments in equipment.

The final problem in the development of these frequencies and acceptance by the general public and industry is the question of whether or not these frequencies have any biological effects on humans.

Respectfully Submitted,

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